

Project Summary

I. INTRODUCTION

This source has applied for a renewal of its Clean Air Act Permit Program (CAAPP) operating permit for its existing operation. The CAAPP is the program established in Illinois for the operating permits for significant stationary sources required by the federal Clean Air Act, as amended in 1990. Unlike this source's current state operating permit(s), the conditions in a CAAPP permit are enforceable by both the Illinois Environmental Protection Agency (Illinois EPA) and the USEPA.

The Reichhold, Inc. Plant is located at 6350 East Collins Road in Morris. The source manufactures three classes of chemicals: latex emulsions, polyester resins and polyurethane dispersions. In addition, the plant operates boilers/heaters to supply heat for the processes.

II. EMISSION UNITS

Significant emission units at this source are as follows:

Emission Unit	Description	Date Constructed	Emission Control Equipment
See Attachment 1	Storage Tanks		See Attachment 1
M-501, M-502, M-503	Monomer Tanks	1970/1976	None
R-101, R-102	Reactors	1970/1976	None
M-505, M-510	Cool Down Tanks	1972/1977	None
M-1	Half Ester Tank	1986	Thermal Oxidizer or HTO Backup Thermal Oxidizer
R-1 through R-7	Seven Reactors	1987/1994/ 2004	Thermal Oxidizer or HTO Backup Thermal Oxidizer
TT-1 through TT-5	Five Thin Tanks	1994/2004	Thermal Oxidizer or HTO Backup Thermal Oxidizer
BT-1 Through BT-5, BT-8 through BT-11, BT-16	Blend Tanks	1974/1986/ 2004	Thermal Oxidizer or HTO Backup Thermal Oxidizer
TL-1 through TL-4	Truck Loading Stations	2004	Thermal Oxidizer or HTO Backup Thermal Oxidizer
DM-1	Drum Filling Line	2004	Thermal Oxidizer or HTO Backup Thermal Oxidizer
	Polyurethane Tank Truck and Drum Loading	1997	Regenerative Thermal Oxidizer (PUR-RTO)
T-407A	Dispersion Tank	1997	Rotoclone (WSC-510)

R-307, T-417	Two Reactors	1997	Regenerative Thermal Oxidizer (PUR-RTO) or Rotoclone WSC-510
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Emission Unit	Description	Date Constructed	Emission Control Equipment
T-217	Weigh Tank (600 Gallons)	1997	None
	Boiler No. 1	1970	None
	Boiler No. 2	1976	None
	Oil Heater	1990	None
	Wastewater Treatment System	1970	None

III. EMISSIONS

This source is required to have a CAAPP permit since it is a major source of emissions. The proposed permit limits the maximum annual emissions from significant emission units at the source. Insignificant activities at this source are not accounted for in the source limit.

For purposes of fees, the source is allowed the following emissions:

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	49.07
Sulfur Dioxide (SO ₂)	24.2
Particulate Matter (PM)	8.16
Nitrogen Oxides (NO _x)	96.09
HAP, not included in VOM or PM	0
Total	177.61

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois.

All emission sources in Illinois must comply with the federal New Source Performance Standards (NSPS). The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.

All emission sources in Illinois must comply with the federal National Emission Standards for Hazardous Air Pollutants (NESHAP). The Illinois EPA is administering NESHAP in Illinois on behalf of the United States EPA under a delegation agreement.

V. PROPOSED PERMIT

A CAAPP permit contains conditions listing the applicable state and federal air pollution control regulations that apply to a source. The permit conditions also establish emission limits and appropriate compliance procedures. The appropriate compliance procedures may

include inspections, work practices, monitoring, record keeping, and reporting to show compliance with these requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the source is operating in accordance with the requirements of the permit.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that this source's permit application meets the standards for issuance of a CAAPP permit. The Illinois EPA is therefore proposing to issue a CAAPP permit, subject to the conditions proposed in the draft permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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